

1 WILLIAM H. BROWN, ESQ. (7623)
2 LAW OFFICES OF WILLIAM H. BROWN, LTD.
3 6029 S. Ft. Apache Rd., #100
4 Las Vegas, NV 89148
5 Telephone: (702) 385-7280
6 Fax: (702) 386-2699
7 Email: Will@whbesq.com

8 Attorney for Defendant Linda Marie Kot

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 VS.

14 HUGO PATRICIO COUTELIN,
15 MICHAEL PERRY,
16 JEFF THOMAS, and
17 LINDA MARIE KOT,

18 Defendants.

No. 2:10-cr-00280-KJD-GWF

**MOTION TO MODIFY
CONDITIONS OF PRETRIAL
RELEASE**

19 COMES NOW the Defendant Linda Marie Kot, by and through her attorney
20 William H. Brown, Esq., of LAW OFFICES OF WILLIAM H. BROWN, LTD., and hereby moves
21 for an order modifying Ms. Kot's conditions of pre-trial release, specifically by removing
22 the condition requiring Ms. Kot to check in with pretrial services every month.

23 This request is based on the following:

24 As set forth in the attached email from U.S. Pretrial Services Officer Tonya
25 Jacobson, Ms. Kot has been supervised by pretrial services since June 17, 2010. She has
26 sustained no violations and complied with all conditions of her release. Accordingly,
27 based on her perfect compliance, Pretrial Services has no objection to removing the
28 condition of supervision.

1 Additionally, the government does not object to removing this condition.

2 Accordingly, Ms. Kot requests the Court enter an order modifying Ms. Kot's
3 conditions of pre-trial release, specifically by removing the condition requiring Ms. Kot to
4 check in with pretrial services every month.
5

6 DATED: February 9, 2012

7 Respectfully submitted,

8 LAW OFFICES OF WILLIAM H. BROWN, LTD.
9

10 BY: /s/ William H. Brown
11 Nevada Bar No.: 7623
12 6029 S. Ft. Apache Rd., Ste. 100
13 Las Vegas, NV 89148
14 Phone: (702) 385-7280
15 Facsimile: (702) 386-2699
16 Email: Will@whbesq.com

17 Attorney for Defendant Linda Marie Kot
18

19 SO ORDERED.
20 .
21 .
22 .
23 
24 _____
25 UNITED STATES MAGISTRATE JUDGE
26 DATE: FEB. 24, 2012
27
28